

May 11, 2014

Objection Reviewing Officer
USDA Forest Service
Northern Region
PO Box 7669
Missoula MT 59807
VIA EMAIL: appeals-northern-regional-office@fs.fed.us

RE: Objection to Blackfoot Travel Plan Final EIS and two RODS and Alternative 4

Dear Reviewing Officer,

I am writing to object to the Blackfoot Travel Plan Final Environmental Impact Statement (FEIS) and two associated Records of Decision (draft RODS). I'm the lead objector representing the other objectors listed below.

We object to Alternative 4 identified in the draft Blackfoot Travel Plan ROD because it results in the loss of the 150 miles of road and trails that were previously available for motorized travel. This is a staggering 30% loss of the public's existing roads and trails that provide motorized opportunities. Alternative 4 will have even more of a negative impact because it closes the Gould-Helmville Trail #467 (the Trail) to all motorized travel on October 15. This will close another 14 miles of motorized trail during rifle hunting season and prevent me, the joining objectors, and the rest the public from using the Gould Helmville Trail to fully enjoy the Nevada Mountain Roadless Area as we can under the existing conditions.

We've expressed our opinions and concerns about the various Alternatives presented by the Forest Service in previous comments and we restate our preference for Alternative 2 and further object to Alternative 4 and the October 15 closure of motorized travel on the Gould-Helmville Trail the following grounds:

First, The EIS fails to present the best available evidence that closing the Gould-Helmville Trail on October 15 is necessary for elk security. We've used the Trail for 38 years from October 15th to December 1st to rifle hunt big game. Currently, motorized use during rifle hunting season comes from the public using their Off Highway Vehicles (OHV) to camp, hunt, and provide prime access to the 49,939 acres inside the Nevada Mountain Roadless Area.

This limited motorized access on the Gould-Helmville Trail during rifle hunting season is in an area that meets the Elk Cover Security Density Standard and does not have any detrimental effects on wildlife that are worth prohibiting motorized completely. (See Email Tyson O'Connell to Amber Kamps - Blackfoot Travel Plan Public Comments 2-6-13, attached hereto). There are only two areas in this Forest Region that meet the Forest Service's current Elk Cover

Security Density Standard and Trail is inside one of these two areas. The Trail traverses a narrow ridge that is covered in dense timber and meets the Elk Cover Density Standard...if this Trail can't remain open to motorized travel during rifle hunting season...what trail can? By adopting Alternative 4, the Forest Service is ignoring its own Elk Cover Density Standard and making an arbitrary and capricious decision.

Second, the EIS ignored our previous comments on how a motorized closure will impact the public's enjoyment of the Nevada Mountain Roadless Area. (See Dec. 6, 2009 Letter from Tyson O'Connell to Jackie Heinert, pages 1-5 and exhibits attached hereto). The Gould-Helmville Trail is unique because it provides limited motorized use (only OHV under 50 inches are allowed) on a narrow ridge inside the Roadless Area. This Trail allows the public to enjoy motorized travel within a semi-primitive area, but more importantly, it allows users to ride along the trail, park our OHV, and then hike even deeper into the Roadless Area. It's difficult to fathom the ideal setting this creates by looking at the maps provided with the EIS, but it's clearly apparent to anyone who's ever used the Trail, that it provides an ideal setting for the public wishing to avoid the logistical challenges and physical realities of hunting inside a Wilderness Area where all motorized travel is prohibited.

I personally have few physical limitations that would prevent me from accessing the Nevada Mountain Roadless Area. Last summer, I completed a 15 hour run that traversed three counties and 56 miles from Benchmark to Holland Lake across the heart of the Bob Marshall Wilderness. And when I want a Wilderness hunting experience I utilize the 1,535,992 acres of Wilderness within the Bob Marshall, Scapegoat, and Great Bear Wilderness Areas, which is located just north of the Blackfoot Travel Planning Area. However, there are many times when I want to hunt where motorized access is limited, yet still provides me with the ability to access a semi-primitive, quiet, and wild area. This is exactly what the Gould-Helmville Trail currently provides by creating limited ingress and egress into the Roadless Area.

The rest of the objectors on this letter, and the large majority of the public, do not have the physical ability to fully enjoy the Nevada Mountain Roadless Area and hunt more than a few miles from the main trailhead, without motorized access on the Gould-Helmville Trail. My father is 57 years old and he's been camping and elk hunting the Nevada Mountain Area every single year for 38 years (before it was even a designated Roadless area). Today I watched him cry as he held my newborn child and realized he'll no longer be able to continue this hunting tradition with me or his granddaughter. This will alter the bond and traditions our family has built and it will also impact the other families who rely on OHVs to access camping and rifle hunting within the Nevada Mountain Area.

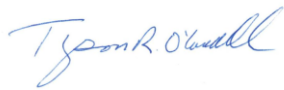
The Roadless Rule specifically allows motorized travel within Roadless Areas:

"Nothing in [the Roadless Rule] as proposed was intended to prohibit the authorized construction, reconstruction, or maintenance of motorized or non-motorized trails that are classified and managed as trails pursuant to existing statutory and regulatory authority and agency direction." *See Fed. Reg.* 3251(Jan. 12, 2001).

The Gould-Helmville Trail is unique because it traverse an area that meets the Forest Service's Elk Cover Density Standard and offers the public the opportunity very limited motorized access into a semi-primitive Roadless Area. There is not another Trail within the Blackfoot Travel Planning Area that provides this access, and it's rare that the Forest Service has an opportunity to preserve such a valuable public hunting opportunity. The Forest Service should strive to create this kind of recreational opportunity, rather than destroy it.

For the reasons in this objections and for all of the reasons previously included in our comments, we object to Alternative 4 and prefer Alternative 2 in the Blackfoot Travel Plan.

Sincerely,



Tyson O'Connell
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Additional Objectors:

Bob O'Connell
Seth O'Connell
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